

HEATHER E. WILLIAMS, Bar #122664
Federal Defender
ERIN SNIDER, Bar #304781
Assistant Federal Defender
Office of the Federal Defender
2300 Tulare Street, Suite 330
Fresno, California 93721
Tel: (559) 487-5561
Fax: (559) 487-5950

Attorneys for Defendant
BRIGIT MARIE BISSELL

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

BRIGIT MARIE BISSELL,

Defendant.

Case No. 1:22-cr-00031-DAD-BAM-1

STIPULATION TO MODIFY
CONDITION OF PRETRIAL RELEASE;
[PROPOSED] ORDER

JUDGE: Hon. Barbara A. McAuliffe

IT IS HEREBY STIPULATED by and between the parties, through their respective counsel, Assistant United States Attorney Antonio Jose Pataca, counsel for plaintiff, and Assistant Federal Defender Erin Snider, counsel for defendant Brigit Marie Bissell, that the condition requiring Ms. Bissell to remain on home detention be modified to curfew. Pretrial Services Officer Anthony Perez supports the modification.

On January 20, 2022, Ms. Bissell appeared before the Honorable Stanley A. Boone for a detention hearing. ECF #11. The Court ordered Ms. Bissell's release subject to conditions. *Id.*; *see also* ECF #15. On January 28, 2022, the government filed a motion for bail review. ECF #20. On February 17, 2022, after much litigation, the Honorable Dale A. Drozd ordered Ms. Bissell to remain on release but added a home-detention condition. ECF #42; ECF #43.

Since February 17, 2022, Ms. Bissell has fully complied with the conditions of her release. She has obtained employment cleaning homes, she maintains stable housing, she

1 completed a substance-abuse-disorder assessment per the instructions of her Pretrial Services
2 Officer, and she is participating in mental-health counseling via Zoom twice a month. Her drug
3 tests have been negative. Meanwhile, she has been very busy with her children's activities. In
4 light of Ms. Bissell's compliance, her Pretrial Services Officer in the Western District of
5 Washington is supportive of modifying the location-monitoring condition to curfew and Anthony
6 Perez, the Pretrial Services Officer in this District, is likewise supportive.

7 Accordingly, the parties stipulate that the following Condition 7(b) be modified as
8 follows:

9 Remove:

10 **HOME DETENTION:** You must remain inside your residence at all times
11 except for employment; education; religious services; medical, substance abuse,
12 or mental health treatment; attorney visits; court appearances; court ordered
13 obligations; or other essential activities pre-approved by the pretrial services
14 officer. Essential activities include haircuts, DMV appointments, banking needs;
15 or other activities that cannot be completed by another person on your behalf.

16 And replace it with:

17 **CURFEW:** You must remain inside your residence every day from 9:00 pm to
18 6:00 am, or as adjusted by the pretrial services officer for medical, religious
19 services, employment or court-ordered obligations.

20
21 Respectfully submitted,

22 PHILLIP A. TALBERT
23 United States Attorney

24 Date: June 2, 2022

25 /s/ Antonio Jose Pataca
26 ANTONIO JOSE PATACA
27 Assistant United States Attorney
28 Attorney for Plaintiff

HEATHER E. WILLIAMS
Federal Defender

Date: June 2, 2022

/s/ Erin Snider
ERIN SNIDER
Assistant Federal Defender
Attorney for Defendant
BRIGIT MARIE BISSELL

ORDER

Upon the parties' stipulation and for good cause shown, it is hereby ordered that Condition 7(b) of defendant Brigit Marie Bissell's pretrial release be modified as follows:

Remove:

HOME DETENTION: You must remain inside your residence at all times except for employment; education; religious services; medical, substance abuse, or mental health treatment; attorney visits; court appearances; court ordered obligations; or other essential activities pre-approved by the pretrial services officer. Essential activities include haircuts, DMV appointments, banking needs; or other activities that cannot be completed by another person on your behalf.

And replace it with:

CURFEW: You must remain inside your residence every day from 9:00 pm to 6:00 am, or as adjusted by the pretrial services officer for medical, religious services, employment or court-ordered obligations.

All other previously imposed conditions not in conflict with this order will remain in full force and effect.

IT IS SO ORDERED.

Dated: June 3, 2022

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE

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